

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, As representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> Debtors. ¹	PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered) This Order shall be filed in Case No. 17-BK-3283-LTS, Case No. 17-BK- 4780-LTS, and Case No. 17-BK-3567-LTS.
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**MOTION FOR EXTENSION OF DEADLINE TO
REPLY TO THE ANSWER OF DEBTORS TO Dk 3333**

To the Honorable United States District Court Judge Laura Taylor Swain:

COMES NOW Autonomous Municipality of Ponce (hereafter, “AMP”), through the undersigned counsel and very respectfully states and prays this urgent motion for entry of an order, substantially in the form attached hereto as Exhibit A (the “Proposed Order”), extending the deadlines set forth in the Order Granting Urgent Joint Motion for Extension of Deadlines in Connection with Autonomous Municipality of Ponce’s Motion for Partial Lift of Stay [ECF No. 3333 in Case No. 17-3283] (the “Amended Scheduling Order”).

Request for Relief

1. On May 4, 2018, the Movant filed the Motion for Partial Lift of Stay [Case No. 17 BK 32830, ECF No. 3019] (the “Motion”), seeking relief from the automatic stay to allow the case

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The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

captioned Municipio de Ponce vs. ACT, et al, Case No. JAC1993-0485 (the “Prepetition Action”), before the Puerto Rico First Instance Court (the “Commonwealth Court”) to proceed, except for any evidentiary hearing on damages, and for the judgment entered on June 24, 1996 in the Prepetition Action before the Commonwealth Court (the “Prepetition Judgment”) to be enforced, except for any judgment or settlement for damages.

2. The Prepetition Judgment requires Debtors, to complete all construction projects detailed in a prepetition Agreement for the Development of Programed Projects between the Central Government and the Municipality of Ponce, dated October 28, 1992 (the “Development Agreement”).

3. On June 21, 2018, the Court entered the Amended Scheduling Order (See Docket No. 3333), which provides that opposition papers to the Motion must be filed by July 5, 2018, and Movant’s reply papers must be filed by July 12, 2018.

4. On July 5, 2018 Debtor HTA request the extensions of the deadlines (see docket 3441) as to the followings:

- a. The deadline for HTA to file an opposition to the Motion, or to otherwise respond, shall be extended to **July 12, 2018**.
- b. The deadline for Movant to file a reply to any opposition filed by HTA shall be extended to **July 19, 2018**.

5. On the next day, this Court GRANTED that extension as requested (see docket 3446).

6. Movant understand that it most cost efficient, and diligent to replay in one motions all the answers of all debtors, rather than in two separate motions, in two separate date, complying with two separate deadlines, and propose as follow:

- a. The deadline for HTA to file an opposition to the Motion, or to otherwise respond, shall be extended to **July 12, 2018**.
- b. The deadline for Movant to file a reply to ALL oppositions filed by Debtors shall be extended to **July 19, 2018**.

Notice

AMP has provided notice of this motion in accordance with the Case Management Procedures to the following parties: (a) the Office of the United States Trustee for the District of Puerto Rico; (b) the indenture trustees and/or agents, as applicable, for the Debtors' bonds; (c) the entities on the list of creditors holding the 20 largest unsecured claims against COFINA; (d) counsel to the statutory committees appointed in these Title III cases; (e) the Office of the United States Attorney for the District of Puerto Rico; (f) counsel to the Oversight Board; (g) the Puerto Rico Department of Justice; (h) the Other Interested Parties;⁶ (i) all parties filing a notice of appearance in these Title III cases; and (j) Movant. A copy of the motion is also available on the Debtors' case website at <https://cases.primeclerk.com/puertorico/>.

AMP hereby submits that, in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE, AMP respectfully requests that the Court enter the Proposed Order and grant such other relief as is just and proper.

In Ponce, Puerto Rico, this 10th day of July, 2018.

/s/**Carlos Fernández-Nadal**
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Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, As representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> Debtors. ²	PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered) This Order shall be filed in Case No. 17-BK-3283-LTS, Case No. 17-BK- 4780-LTS, and Case No. 17-BK-3567-LTS.
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ORDER GRANTING MOTION FOR EXTENSION OF DEADLINES IN CONNECTION
WITH AUTONOMOUS MUNICIPALITY OF PONCE'S MOTION FOR PARTIAL LIFT OF STAY

The Court has received and reviewed the Motion for Extension of Deadlines (Docket Entry No. in Case No. 17-3283, the "Extension Motion"). The Extension Motion is hereby granted to extent provided herein. The deadline for Movant's AMP to reply to **ALL opposition** filed by Debtors must be filed by **July 19, 2018 at 5:00 p.m.** (Atlantic Standard Time).

This order resolves Docket Entry No. 3333 and No. 3446 in Case No. 17-3283.

SO ORDERED.

Dated: July ____, 2018

LAURA TAYLOR SWAIN
United States District Judge

² The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).